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Rachel Perillo

July 22, 2020

By ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application denied.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
July 23, 2020

Re: United States v. Motley et al.,
Including AMNON FILIPPI
S2 12 Cr. 604-3 (RA)

Dear Judge Abrams:

I represent Amnon Filippi, a defendant in the above-referenced matter. I write to respectfully request that your Honor authorize the early termination of Mr. Filippi's supervised release pursuant to 18 U.S.C. § 3583(e). Mr. Filippi made a prior application for early termination of supervised release by letter dated July 19, 2019 (ECF Doc. 225), which the Court denied without prejudice to renew at a later date. (ECF Doc. 228). Accordingly, Mr. Filippi wishes to update the Court on his continued compliance with supervision and seeks to renew his previous application for termination of supervised release.

18 U.S.C. § 3583(e) provides that a Court may terminate a term of supervised release at any time after expiration of one year, "if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice." Mr. Filippi has been out of prison since July 27, 2017.¹ He was released to a halfway house and then served a term of home confinement before formally commencing his supervised release on January 22, 2018. Thus, although he has completed two-and-a-half years of supervised release, Mr. Filippi has been out of prison for three years and has abided by all conditions and requirements during this period.

¹ The relevant procedural history of Mr. Filippi's case is detailed in our July 19, 2019 letter.

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Since making this application one year ago, it is our belief that Mr. Filippi has continued to be compliant with supervision, reporting to U.S. Probation as required, working as a professional poker player when he can (which has been limited by the COVID-19 pandemic), returning from international travel on schedule, and he has not been arrested. He also completed substance abuse treatment in the fall of 2019. Accordingly, given Mr. Filippi's continued compliance, it is respectfully submitted that his exemplary post-release conduct and the interests of justice warrant early termination of his supervised release. *See* 18 U.S.C. § 3583(e).

My office has conferred with Mr. Filippi's U.S. Probation Officer, Zondra Jackson, who opposes the instant request. The government, by AUSA Elisha Kobre, also opposes this request.

If the Court has any questions regarding this application, please contact my office.

Respectfully submitted,

/s/

Jeremy Schneider

cc: Elisha Kobre (by ECF & email)
Assistant United States Attorney

Zondra Jackson (by email)
United States Probation Officer